

1 have to reallocate lines or do those types of things
2 during offpeak hours simply because of calls that, as
3 you stated, you believe are a result of use of the
4 Internet?

5 A In some offices we have had to do this,
6 yes.

7 Q Can you give me an idea of how many
8 offices? Is it a small number of offices? Is it a
9 large number of offices?

10 A We have had to do it in some offices, some
11 number of offices. I don't have a number.

12 Q Could you give me a percentage?

13 A No.

14 Q Is it more than 50 percent?

15 A No.

16 Q More than 25 percent?

17 MR. MAZIQUE: Objection, your Honor. The
18 witness has said she can't give a percentage.

19 ALJ MALCOLM: Well --

20 MR. FRASER: I'll withdraw the question.

21 Q Does this problem you've identified that
22 we've just been talking about, does it apply equally
23 for persons using the -- making long analog phone
24 calls as well as persons using long duration ISDN
25 calls?

26 A Yes.

27 Q Do you have any evidence that -- what makes
28 you certain that these patterns that you've

1 identified are the result of the use of the Internet?

2 A We have done some study work that indicates
3 that Internet usage is creating this phenomenon, and
4 the study that I mentioned earlier, the ESP
5 exemption -- the study work that we did as part of
6 the the ESP exemption is one of those studies.

7 MR. FRASER: At this time I want to have a
8 document identified for the record. 43? Exhibit 43?

9 ALJ MALCOLM: Yes, that would be Exhibit
10 43.

11 (Exhibit No. 43 marked for identification)

12 MR. FRASER: This is Pacific Bell's
13 response to UCAN's First Sets of Data Requests,
14 Request No. 12.

15 ALJ MALCOLM: Thank you.

16 MR. FRASER: It's not identified as
17 proprietary. I don't think there's anything in here
18 that is.

19 MR. MAZIQUE: No, this is not proprietary.

20 MR. FRASER: Q Now, Ms. Low, I've just
21 given you a copy of Exhibit 43. I'd like you to take
22 a look at that and read it through carefully, if you
23 would.

24 (Witness reviewing document)

25 Q Are you ready?

26 A Um-hmm.

27 Q Okay. Were you involved in the preparation
28 of this response at all? Is this familiar to you?

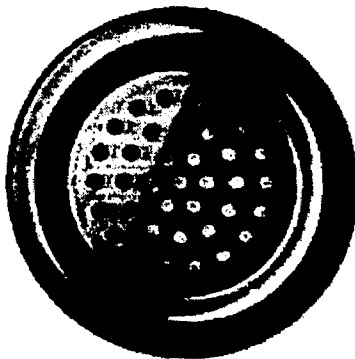
ATTACHMENT C



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*Some restrictions apply